

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

NETLIST, INC.,

Plaintiff,

VS.

Case No. 2:22-cv-293-JRG

SAMSUNG ELECTRONICS CO, LTD;
SAMSUNG ELECTRONICS AMERICA,
INC.; SAMSUNG SEMICONDUCTOR
INC.,

JURY TRIAL DEMANDED

SAMSUNG ELECTRONICS CO, LTD;
SAMSUNG ELECTRONICS AMERICA,
INC.; SAMSUNG SEMICONDUCTOR
INC.,

INC.; SAMSUNG SEMICONDUCTOR
INC.,

INC.,

Defendants.

Defendants.

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF
NETLIST'S MOTION FOR A PRELIMINARY INJUNCTION AND THEN A
SUBSEQUENT PERMANENT INJUNCTION UPON THE RESOLUTION
OF ALL POST-TRIAL MOTIONS**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Motion For A Preliminary Injunction And Then A Subsequent Permanent Injunction Upon The Resolution Of All Post-Trial Motions. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of JX-17.

3. Attached as **Exhibit 2** is a true and correct copy of PX-21.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the deposition transcript of Paik Ki Hong, dated August 12, 2021.

5. Attached as **Exhibit 4** is a true and correct copy of SAM-NET-293_00059133.

6. Attached as **Exhibit 5** is a true and correct excerpted copy of a document titled “Samsung Electronics Co., Ltd. 2022 Business Report For the year ended December 31, 2022.”

7. Attached as **Exhibit 6** is a true and correct excerpted copy of the Expert Report of Mr. David Kennedy, dated November 21, 2023.

8. Attached as **Exhibit 7** is true and correct copy of the Decision Denying Petitioner’s Request on Rehearing of Decision Denying Institution of *Inter Partes Review* in IPR2022-00237, dated September 16, 2022.

9. Attached as **Exhibit 8** is a true and correct copy of the Redacted Central District of California Jury Verdict Form, Case No. 20-cv-00993, dated May 17, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on December 4, 2024, in Los Angeles, California.

By /s/ Jason G. Sheasby

Jason G. Sheasby